

Mr. Fred Glassford  
The Budd Company Plastics Division  
2620 Marion Drive  
Kendallville, Indiana 46755

Re: 113-12921-00018  
First Administrative Amendment to  
Part 70 T113-6873-00018

Dear Mr. Glassford:

The Budd Company Plastics Division was issued a permit on September 28, 1999 for a stationary fiberglass reinforced plastic automotive parts production operation. A letter requesting the addition of robotic paint applicators for electrostatic disc spray booths B03 and B04 was received on October 31, 2000. The potential to emit for spray booths B03 and B04 will not increase as there are restrictions on the amount of material processed in the PSD Minor Limit that have been treated as part of the emission units design. This proposed modification is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) or 326 IAC 8-1-6 (New Facilities; General Reduction Requirements), as the potential to emit will not increase.

Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows: Section A.2 of the permit has been revised to mention that the emission units utilize robotic paint applicators:

- (a) One (1) **manual and robotic air atomization spraying and** electrostatic disc spraying booth, identified as B03, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S17 and S18);
- (b) One (1) **manual and robotic air atomization spraying and** electrostatic disc spraying booth, identified as B04, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S19 and S20);

The emission unit descriptions for air atomization spray booths B01 and B02 have been revised to mention that these units also utilize existing permitted robotic paint applicators.

- (a) One (1) **manual and robotic** air atomization spray booth, identified as B01, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S11 and S12);
- (b) One (1) **manual and robotic** air atomization spray booth, identified as B02, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S13 and S14);

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Phillip Ritz, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for extension (3-6878), or dial (973) 575-2555, extension 3241.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

PR/EVP

cc: File - Noble County  
U.S. EPA, Region V  
Noble County Health Department  
Air Compliance Section Inspector - Doyle Houser  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michelle Boner

# **PART 70 OPERATING PERMIT**

## **Office of Air Quality**

**The Budd Company Plastics Division**  
**2620 Marion Drive**  
**Kendallville, Indiana 46755**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T113-6873-00018	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: September 28, 1999  <b>Expiration Date: September 28, 2005</b>
First Administrative Amendment:113-12921	Pages Affected: 5, 6, 7, 8, 33, 34, 35 and 36
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] **[326 IAC 2-7-1(22)]**

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The Permittee owns and operates a stationary fiberglass reinforced plastic automotive parts production operation.

Responsible Official: Fred Dannhauser  
Source Address: 2620 Marion Drive, Kendallville, Indiana 46755  
Mailing Address: 2620 Marion Drive, Kendallville, Indiana 46755  
Phone Number: 219-347-5973  
SIC Code: 3089  
County Location: Noble  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) 4800 ton compression molding press, identified as PR01, constructed in April 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (2) One (1) 3600 ton compression molding press, identified as PR02, constructed in April 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (3) One (1) 3600 ton compression molding press, identified as PR03, constructed in April 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (4) One (1) 1800 ton compression molding press, identified as PR04, constructed in May 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (5) One (1) 1800 ton compression molding press, identified as PR05, constructed in May 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (6) One (1) 1800 ton compression molding press, identified as PR06, constructed in June 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (7) One (1) 900 ton compression molding press, identified as PR07, constructed in May 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);

- (8) One (1) 1850 ton compression molding press, identified as PR08, constructed in November 1998, with maximum capacity of 312.5 pounds in input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (9) One (1) 1800 ton compression molding press, identified as PR09, constructed in October 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (10) One (1) 4200 ton compression molding press, identified as PR11, constructed in October 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (11) One (1) 1800 ton compression molding press, identified as PR12, constructed in October 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (12) One (1) 1850 ton compression molding press, identified as PR13, constructed in November 1998, with maximum capacity of 312.5 pounds of input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (13) One (1) 1850 ton compression molding press, identified as PR14, constructed in November 1998, with maximum capacity of 312.5 pounds of input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (14) One (1) 1850 ton compression molding press, identified as PR15, constructed in November 1998, with maximum capacity of 312.5 pounds of input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (15) One (1) 330 ton compression molding press, identified as PR20, constructed in April 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (16) One (1) 330 ton compression molding press, identified as PR21, constructed in March 1995, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (17) One (1) air atomization spray booth, identified as B01, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S11 and S12);
- (18) One (1) air atomization spray booth, identified as B02, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S13 and S14);
- (19) One (1) electrostatic disc spray booth, identified as B03, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S17 and S18);
- (20) One (1) electrostatic disc spray booth, identified as B04, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S19 and S20);
- (21) One (1) secondary finishing operation for smoothing the molded parts, using a dust collection system as control.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;
  - (a) One (1) natural gas or propane fired boiler, identified as BR01, constructed in September 1988, with maximum heat input capacity of 8.369 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (S24)
  - (b) One (1) natural gas or propane fired boiler, identified as BR02, constructed in September 1988, with maximum heat input capacity of 8.369 million British thermal units per hour (mmBtu/hr), exhausting to one (1) stack (S24)
  - (c) One (1) natural gas or propane fired paint bake oven, identified as BA01, constructed in December 1988, with maximum heat input capacity of 8.8 million British thermal units per hour (mmBtu/hr), exhausting to two (2) stacks (S22 and S23)
- (2) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour;
- (3) Combustion source flame safety purging on startup;
- (4) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
- (5) VOC and HAP storage vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (6) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings;
- (7) Cleaners and solvents characterized as follows:
  - (a) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
  - (b) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F);  
the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
- (8) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;
- (9) Closed loop heating and cooling systems;
- (10) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;
- (11) Forced and induced draft cooling tower system not regulated under a NESHAP;
- (12) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

- (13) Heat exchanger cleaning and repair;
- (14) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (15) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (16) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment;
- (17) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
- (18) On-site fire and emergency response training approved by the department;
- (19) Diesel generators not exceeding 1600 horsepower;
- (20) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;
- (21) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kPa measured at 38 degrees C);
- (22) A laboratory as defined in 326 IAC 2-7-1(20)(C);
- (23) Other activities or categories not previously identified:
  - Insignificant Thresholds:
    - Lead (Pb) = 0.6 ton/year or 3.29 lbs/day
    - Carbon Monoxide (CO) = 25 lbs/day
    - Sulfur Dioxides (SO<sub>2</sub>) = 5 lbs/hour or 25 lbs/day
    - Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
    - Nitrogen Oxides (NO<sub>x</sub>) = 5 lbs/hour or 25 lbs/day
    - Volatile Organic compounds (VOC) = 3 lbs/hour or 15 lbs/day
  - (a) Touch Up Areas A, B, C, D, E, F, G, H, I, J;
  - (b) Bonding Areas A, B, C, D, E, F, G, H, I, J, K, L, M, N, O, P; and
  - (c) Touch Up Booth A and Touch Up Booth B.

**A.5 Part 70 Permit Applicability [326 IAC 2-7-2]**

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### **Facility Description [326 IAC 2-7-5(15)]:** Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) 4800 ton compression molding press, identified as PR01, constructed in April 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (2) One (1) 3600 ton compression molding press, identified as PR02, constructed in April 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (3) One (1) 3600 ton compression molding press, identified as PR03, constructed in April 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (4) One (1) 1800 ton compression molding press, identified as PR04, constructed in May 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (5) One (1) 1800 ton compression molding press, identified as PR05, constructed in May 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (6) One (1) 1800 ton compression molding press, identified as PR06, constructed in June 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (7) One (1) 900 ton compression molding press, identified as PR07, constructed in May 1989, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (8) One (1) 1850 ton compression molding press, identified as PR08, constructed in November 1998, with maximum capacity of 312.5 pounds in input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (9) One (1) 1800 ton compression molding press, identified as PR09, constructed in October 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (10) One (1) 4200 ton compression molding press, identified as PR11, constructed in October 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (11) One (1) 1800 ton compression molding press, identified as PR12, constructed in October 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (12) One (1) 1850 ton compression molding press, identified as PR13, constructed in November 1998, with maximum capacity of 312.5 pounds of input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (13) One (1) 1850 ton compression molding press, identified as PR14, constructed in November 1998, with maximum capacity of 312.5 pounds of input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (14) One (1) 1850 ton compression molding press, identified as PR15, constructed in November 1998, with maximum capacity of 312.5 pounds of input sheet molding compound (SMC) per hour, exhausting to two (2) stacks (RVG01 and RVG02);
- (15) One (1) 330 ton compression molding press, identified as PR20, constructed in April 1994, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (16) One (1) 330 ton compression molding press, identified as PR21, constructed in March 1995, with maximum capacity of 500 pounds of input sheet molding compound (SMC) per hour, exhausting to one (1) stack (RVG01);
- (17) One (1) air atomization spray booth, identified as B01, constructed in December



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|      | 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S11 and S12);  |
| (18) | One (1) air atomization spray booth, identified as B02, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S13 and S14);    |
| (19) | One (1) electrostatic disc spray booth, identified as B03, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S17 and S18); |
| (20) | One (1) electrostatic disc spray booth, identified as B04, constructed in December 1988, with maximum capacity of 100 pounds per hour, using waterwash and baffles as control, exhausting to two (2) stacks (S19 and S20); |
| (21) | One (1) secondary finishing operation for smoothing the molded parts, using a dust collection system as control.   |

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 (General Reduction Requirements), CP No. 113-3288-00018, issued February 4, 1994 and CP No. 113-4116-00018, issued January 27, 1995, the robotic painting operation shall consist of electrostatic spraying with an organic solvent concentration of 9.0 pounds of VOC per gallon of solids (4.05 pounds of VOC per gallon of coating, excluding water). The organic solvent concentration of the coatings shall be re-evaluated on an annual basis. In order to effect successful application by the electrostatic system it is necessary first to lay down a very thin layer of coating by the conventional air atomized application system.

#### D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit VOCs is limited to less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) The input VOC from the four (4) paint booths and the sixteen (16) compression molding presses shall be limited such that the potential to emit (PTE) volatile organic compounds shall be less than 230 tons per twelve (12) consecutive month period, rolled on a monthly basis. Compliance with this limit shall be determined based upon the following criteria:
  - (1) The input VOC from the four (4) paint booths shall be considered equivalent to VOC emissions.
  - (2) Monthly usage by weight and monomer content for styrene shall be recorded. Emission factors shall be obtained from the reference approved by IDEM, OAQ. Styrene emissions shall be calculated using the following equation:  
$$\text{Potential to Emit (tons/year)} = \text{Styrene containing material usage (tons/year)} * \text{weight percent styrene} * \text{weight percent emitted}$$
  - (3)  $(\text{input VOC from the four (4) paint booths}) + [\text{input VOC from the sixteen (16) compression molding presses: } (\text{Styrene containing material usage (tons/year)} * \text{weight percent styrene} * \text{weight percent emitted})] < 230 \text{ tons per twelve (12) consecutive month period.}$
- (c) Any change or modification which may increase the potential to emit of VOCs or any other criteria pollutant to 250 tons per year or greater, from the equipment covered in this permit, shall require approval from IDEM, OAQ before such change may occur.

#### D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from the four (4) spray booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the four (4) spray booths and the waterwash and baffle control devices.

**Compliance Determination Requirements**

**D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) and Particulate Matter (PM) limits specified in Conditions D.1.1, D.1.2, and D.1.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.6 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.7 VOC Emissions**

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**D.1.8 Particulate Matter (PM)**

Pursuant to 326 IAC 6-3-2, the waterwash and baffles for PM control shall be in operation at all times when the four (4) spray booths are in operation.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.9 Monitoring**

- (a) Daily inspections shall be performed to verify that the water level of the water pans meet the manufacturer's recommended level. To monitor the performance of the water pans, the water level of the pans shall be maintained weekly at a level where surface agitation indicates impact of the air flow. Water shall be kept free of solids and floating material that reduces the capture efficiency of the water pan. To monitor the performance of the baffles, weekly inspections of the baffle panels shall be conducted to verify placement and configuration meet recommendations of the manufacturer. In addition, weekly observations shall be made of the overspray from the surface coating booth stacks (S11, S12, S13, S14, S17, S18, S19 and S20) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.10 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, weekly observations of the water level in the pans, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.11 Reporting Requirements**

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.